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Of Counsel for KBR Defendants

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

ROCKY BIXBY, et al,

Plaintiffs,

vs.

KBR INC., et al.,

Defendants.

No. 09-cv-632-PK

Defendants' FRCP 56(b) Motion For Summary  
Judgment re Causation and Certificate of  
Compliance with LR 7.1

Oral Argument Requested

I.  
Motion

Defendants KBR, Inc., Kellogg, Brown & Root Service, Inc., KBR Technical Services, Inc., Overseas Administration Services, Ltd., and Service Employees International, Inc. respectfully seek summary judgment pursuant to Fed.R.Civ.P. 56(b) against all plaintiffs based on plaintiffs' failure to provide the legally required proof and expert opinion to create a genuine issue of material fact on the causation element of their claims.

Pursuant to District of Oregon Local Rule 7.1(f)(2), the KBR defendants respectfully request oral argument of this motion.

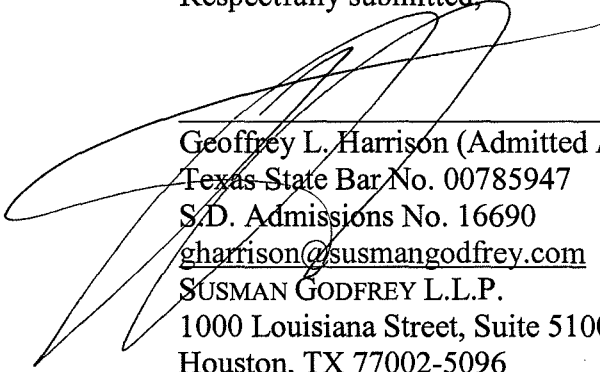
This motion is supported by the Court's file and record in this matter by the affidavit of Chanler A. Langham and its attachments, and by the accompanying memorandum in support of the motion, and by any oral argument that may be held on this motion.

II.  
LR 7.1

Pursuant to District of Oregon Local Rule 7.1, counsel for defendants (Mr. Harrison) certifies that conferred in good faith with counsel for plaintiffs (Mr. Sugerman) concerning the issues raised in this motion and the accompanying memorandum, but the parties were not able to resolve those issues. The parties did discuss and agree that certain individual medical summaries should be filed under seal, and that has been done.

Dated: September 30, 2011

Respectfully submitted,



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